



Heritage Statement

St John's Studio,
Harley Road
LB Camden

May 2022 | Project Ref 7440A

HCUK Group is a multi-disciplinary environmental practice offering expert advice in archaeology, heritage, landscape, arboriculture, and planning. It began life in 2010 as Heritage Collective LLP, before becoming Heritage Collective UK Limited in 2014. In the coming years diversification saw the addition of Archaeology Collective, Landscape Collective and Planning Collective, before all strands came together to be branded under a single umbrella: HCUK Group, based on the acronym for the original company. A home working company since the beginning, we are pleased to employ a talented workforce of consultants and support staff, who are on hand to advise our clients.



Project Number: 7440A

File Origin: <https://heritagecollectiveuk.sharepoint.com/sites/Projects/Shared Documents/Projects 7001-7500/7401-7500/07440 - St John's Studio, Harley Rd/HER/Reports/2022.05.03 St Johns Studio heritage statement.docx>

Author with date	Reviewer code, with date
JOR 26.9.21 Revised 05.05.22	

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1. Introduction

1.1 This heritage statement has been prepared by HCUK Group on the behalf of the owner of St Johns Studio, Harley Road, Camden, NW3 3BY.

1.2 It presents information on heritage assets to assist and inform a planning application to Camden Borough Council relating to the adaptation and extension of this building which is within the Elsworthy Road Conservation Area, a designated heritage asset.

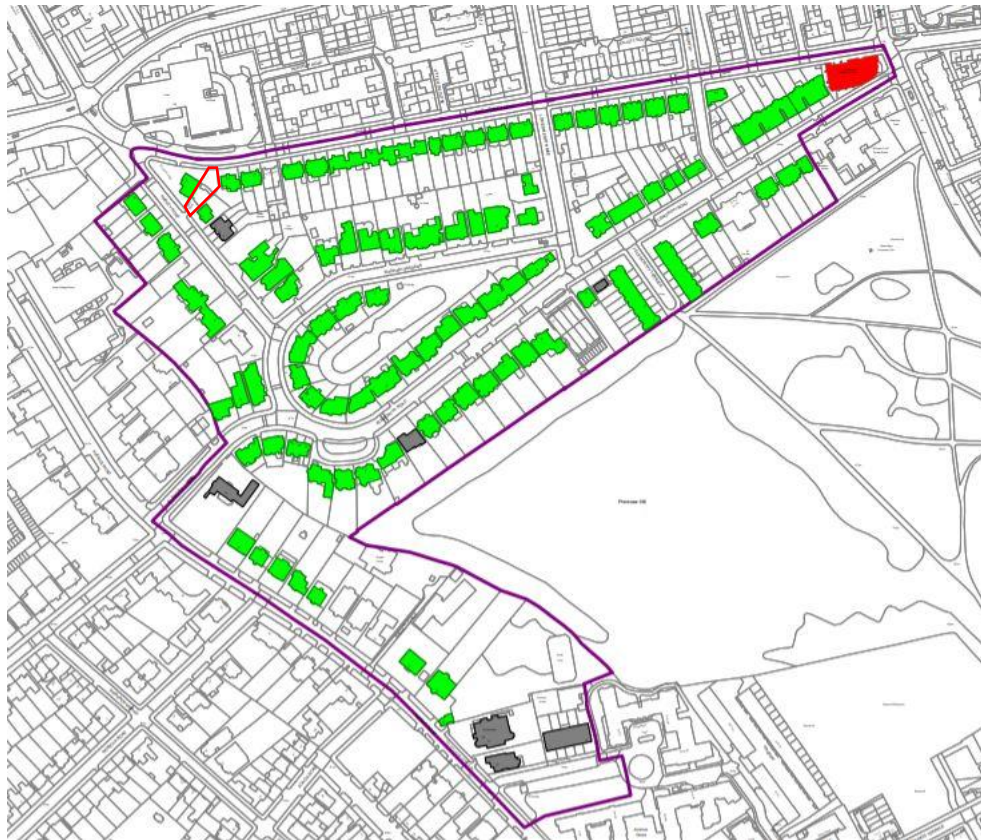


Figure 1: Site Location within Elsworthy Conservation Area (map base: Camden BC). Green shaded buildings are positive contributors, red are listed buildings and grey are detracting buildings. The site is located close to the north eastern corner of the area.

The Context

1.3 St John's Studio is a modern structure identified as making a neutral contribution to the conservation area. It has a convoluted and illogical internal plan and the owners wish to rationalise and improve the interior at the same time as achieving a modest

extension by adapting the roof form to provide additional space, and creating a small extension to the rear on the footprint of an existing covered patio area.



Figure 2: existing site in its built context.

- 1.4** Pre-application discussions were had with CBC during 2021 and the revised proposals submitted here have taken into consideration of the results of that discussion, particularly with regard to the design of the facades and the consideration of amenity and privacy concerns relating to neighbouring properties. A written pre-application response was provided under reference: 2021/4917/PRE in March 2022. This report should be read alongside the Design and Access Statement and full drawn package prepared by Gianni Botsford Architects.

Purpose of this Statement

- 1.5** The character and appearance of the conservation area is considered within this report which assesses its special interest and significance and the impact of the pre-application scheme to inform discussions with the local authority. It presents proportionate background history, including reference to the adopted conservation area appraisal document, and a statement of significance set out in line with the four values identified within the conservation area.

Key Considerations

- 1.6** Elsworthy Conservation Area is the primary heritage asset with the potential to be affected through this proposal, which sits within its designated area. Other adjacent buildings are identified as being of local merit and assumed to be considered as 'non designated heritage assets' by the local authority.
- 1.7** Following a site visit and the exercise of professional judgement it was determined that there are no listed buildings with the potential to have their significance affected by the proposals.

2. Relevant Planning Policy Framework

- 2.1** The decision maker is required by sections 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 to have special regard to the desirability of preserving the character and appearance of a conservation area when exercising planning functions. The decision maker must give considerable importance and weight to the desirability of preserving the significance of the listed building, and there is a strong presumption against the grant of permission for development that would harm its heritage significance.¹
- 2.2** For the purposes of this statement, preservation equates to an absence of harm.² Harm is defined in paragraph 84 of Historic England's Conservation Principles as change which erodes the significance of a heritage asset.³
- 2.3** The significance of a heritage asset is defined in the National Planning Policy Framework (NPPF) as being made up of four main constituents: architectural interest, historical interest, archaeological interest and artistic interest as well as any contribution made by an asset's setting. The assessments of heritage significance and impact are normally made with primary reference to the four main elements of significance identified in the NPPF.
- 2.4** The setting of a heritage asset can contribute to its significance. Setting is defined in the NPPF as follows:
- The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.*
- 2.5** The NPPF requires the impact on the significance of the designated heritage asset to be considered in terms of either "substantial harm" or "less than substantial harm" as described within paragraphs 201 and 202 of that document. National

¹ Barnwell Manor Wind Energy Limited v East Northamptonshire District Council and others [2014] EWCA Civ 137. This principle has recently been confirmed, albeit in a lower court, in R (Wyeth-Price) v Guildford Borough Council.

² South Lakeland v SSE [1992] 2 AC 141.

³ Conservation Principles, 2008, paragraph 84.

Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and case law describes substantial harm in terms of an effect that would vitiate or drain away much of the significance of a heritage asset.⁴ The Scale of Harm is tabulated at Appendix 1.

2.6 Paragraphs 201 and 202 of the NPPF refer to two different balancing exercises in which harm to significance, if any, is to be balanced with public benefit.⁵ Paragraph 18a-020-20190723 of National Planning Practice Guidance (NPPG) online makes it clear that some heritage-specific benefits can be public benefits. Paragraph 18a-018-20190723 of the same NPPG makes it clear that it is important to be explicit about the category of harm (that is, whether paragraph 201 or 202 of the NPPF applies, if at all), and the extent of harm, when dealing with decisions affecting designated heritage assets, as follows:

Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.

2.7 Paragraphs 199 and 200 of the NPPF state that great weight should be given to the conservation of a designated heritage asset when considering applications that affect its significance, irrespective of how substantial or otherwise that harm might be.

2.8 Paragraph 206 states that local authorities should look for opportunities within conservation area for development to enhance or better reveal their significance and paragraph 207 recognises that not all elements of a conservation area may contribute to its significance.

2.9 Camden's Local Plan was adopted in 2017. Policy D2: Heritage covers both designated heritage assets and conservation areas specifically as follows (sections on listed buildings specifically are not quoted and not relevant to this project):

Policy D2 Heritage

The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed

⁴ Bedford Borough Council v SSCLG and Nuon UK Limited [2013] EWHC 4344 (Admin).

⁵ The balancing exercise was the subject of discussion in City and Country Bramshill v CC SLG and others [2021] EWCA, Civ 320.

buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

Designated heritage assets

Designed heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. the nature of the heritage asset prevents all reasonable uses of the site;*
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.*

The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

Conservation areas

Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas. The Council will:

- e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*
- f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;*

g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and

h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.

2.10 Camden maintains a local list of buildings considered not to meet the criteria for statutory protection but to have sufficient local interest to merit identification on a local list and be considered 'non designated heritage assets' within the terms of the NPPF. No buildings on the site or in the immediate vicinity of the site are identified on the local list. The buildings in the surroundings are identified as making a positive contribution to the character and appearance of the conservation area, but this is a different classification from that of a non-designated heritage asset.

3. Background and Development

Cartographic Evidence

- 3.1** The site falls on an area that was historically part of the Eton college estate. It was until the early 19th century agricultural land with Primrose Hill a noted high point in the landscape. The 1844 map of London and its environs shows the still undeveloped nature of the site area, but the route of the London and Birmingham Railway, shown as tunnelled to the north of the site under the higher ground of Primrose Hill, is shown signalling the expansion and growth of transport links to this area which prompted rapid development of housing in the subsequent decades.



Figure 3: 1844 Map of London and its environs. The dot marks the approximate later position of Harley Road. (Layers of London)

- 3.2** The first large scale map available dates to 1871 and shows the northern stretch of Harley Road and western end as developed with villas in large plots but the road extending to remaining open land north of Primrose hill.

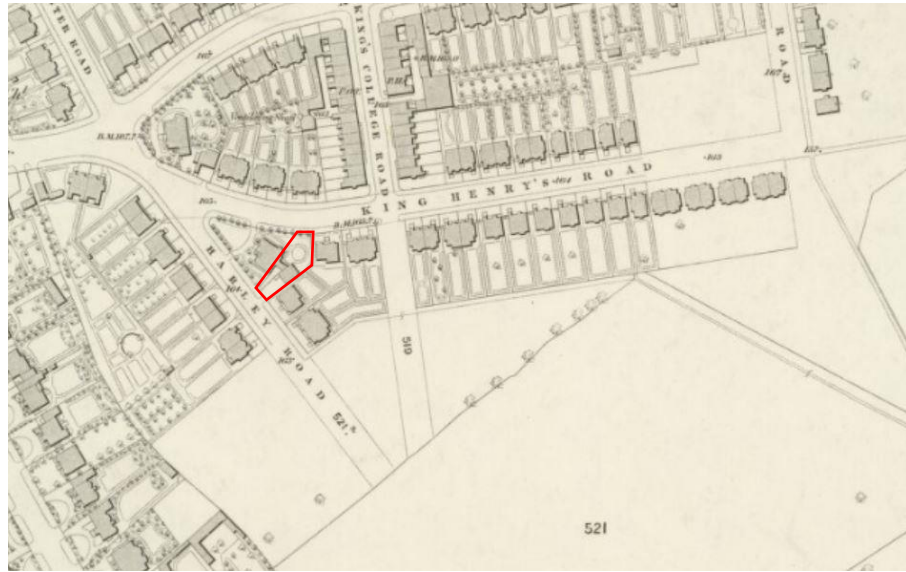


Figure 4: 25 inches to one mile OS edition of 1871, surveyed 1866

- 3.3** The site at this point is clearly developed with a square building with a narrow link to the adjacent corner property. A drive leads across the north western front of the corner building with an extension down to a turning circle in the north east part of the property suggesting that the building on the present site was at this point a coach house of some sort.
- 3.4** The last large scale map of the 19th century shows the linking structure as glazed (figure 5) and by 1935 a separate small block has been added to the north of the site in place of the turning circle, these are probably free standing garages reflecting a shift from horse to vehicle transport.



Figures 5-6: (left) 1898 25 inches to one mile map extract showing glazed link and, (right) 1935 map showing the final development of the southern extent of Harley Road and a new free standing building constructed north of the current site. The building then on the site has a small northern extension.

3.5

The precise form of early structures on this site is not known. The London Photographic Archive contains no historic images of the building and only one aerial photograph has been sourced, which indicates an entrance from Harley Road and suggests a comparatively small or low building because its upper parts are concealed by the larger scale building at no.1 Harley Road⁶.

3.6

A series of planning permissions were granted from 1995 through to 1997 for the redevelopment of the site. As existing drawings on 1995 application 960226 (figure 7) shows a three storey building with horizontal window emphasis, typical of the inter or immediately post war period, and what appears to remain a conservatory style upper part to the linking structure. The consented as proposed drawing (Figure 7) from this application shows a more modern flat roofed form with projecting bay window.

⁶ Image under copyright but viewable online at Britain from Above under reference: 1949 AP EAW021451 ENGLAND (1949)

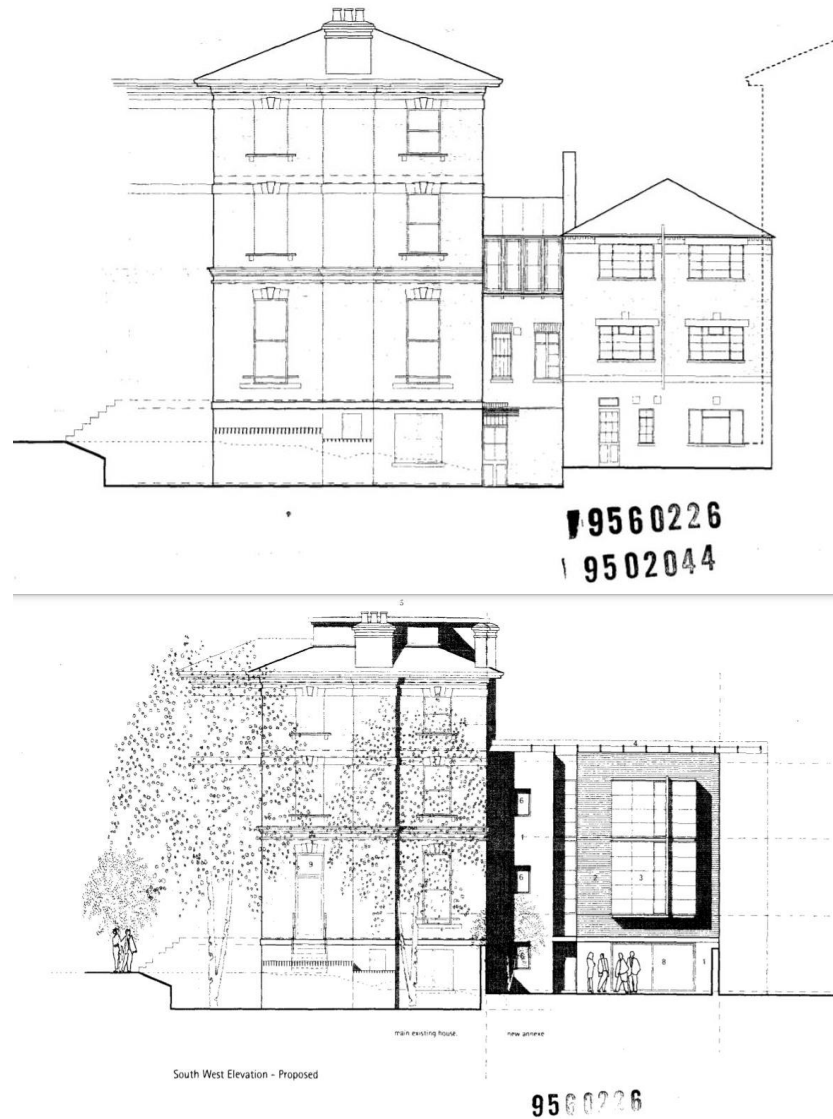


Figure 7: As existing and proposed south western elevations of St John's Studio site and link to St John's Lodge in 1995 (Camden online planning pages).

3.7

Slightly later applications dating to 1996-7 and consented under reference PE9606066R1 resulted in the current building rebuilt on the site. The architect during this period was a firm called Walters and Cohen.



Figure 8: (left) front south west and (right) north elevations of scheme consented in 1997 (Camden online planning application search)

3.8

The building today has changed further with applied details to the entrance and windows added to the south western elevation and a series of ground floor extensions and additions to the northern elevation.



Figure 9: (left) front elevation today, note applied porch and window hoods and grated window sill planters. Figure 10: (right) rear elevation with window sills and consented later extensions and pergola at ground floor level.

4. Statement of Significance

Assessment of Significance

- 4.1** This chapter of the report establishes the significance of the relevant heritage assets – the Elsworthy Conservation Area - in the terms set out in the NPPF utilising the four values, architectural, historic, archaeological and artistic. The contribution of the site is discussed.
- 4.2** Reference is made to the Conservation Area Appraisal (CAA) which was adopted by Camden BC in 2009. The conservation area was first designated in February 1973 with extensions in November of 1985 and 1991 to form its current extent of 16.4 ha.

Elsworthy Conservation Area

- 4.3** Section 3 of the CAA contains a summary of the features that play into the special interest of the conservation area. This section picks up on those aspects as well as pertinent observations related specifically to the site under consideration here.

Architectural Value

- 4.4** The area has a spacious quality with generously laid out plots and generally large scale buildings. Terraces in the area are predominantly four storeys in height, with lower individual buildings having substantial footprints if not the height. Buildings are almost exclusively set back from pavement edges and boundary treatments with low walls, gates, hedges and now mature trees all contribute to a leafy residential character. This layout of buildings in the streets is part of the architectural value of the area and reflects the affluence of this suburb at the time of its creation. This character has persisted to the present day with no real incursion of commercial or other uses and although some of the larger buildings have been converted to form flats (St John's Lodge being one example) the sense of single large buildings in generous plots remains. The conservation area is divided into sub areas and each area has a distinct architectural character, the site falls within Sub Area 2: King Henry's Road.
- 4.5** Architectural interest is also provided in the specific forms and detailing of the buildings within the conservation area. On King Henry's Road and the northern end

off Harley Road there is a high degree of consistency in the large semi-detached properties which represent the denser typology of residential development. Larger, more spacious individual properties developed on the southern end of Harley Road and elsewhere in the area have more individual character with a mixture of architectural styles apparent including prominent Arts and Crafts style buildings of the later 19th and early 20th century eras. Around the site yellow or pale London stock brick is prevalent with stucco details like pediments, lintels and corbels on the older buildings.



Figure 11 (left) view west along King Henry's Road (towards the site set within the trees in the distance) illustrating the strong consistency of higher density built form on this edge of the conservation area. **Figure 12 (right):** view north west to the early Victorian buildings at St John's Lodge and no. 1 Harley Road (the site is set back between these two) and the later red brick buildings at nos 3-5 identified as detracting from the conservation area.



Figure 13: No.26 Harley Road in a broadly Arts and Crafts style with dormers, gables and decorative chimneys with modern styled no.26a consented in 2010.

- 4.6** The Conservation Area does contain more recent buildings, some of which are poorly detailed and pay little heed to the prevailing character of the area (nos 3-5 Harley road for example, see Figure 12) and others which are neutral in character such as the modern design by Darling Associates at no.26a on the opposite side of Harley road from the site.
- 4.7** The combination of both strong groups of consistent buildings and more varied styles of several periods, most of which are well detailed and interesting to a greater or lesser degree in their own right, combine to form the architectural value of the conservation area.
- 4.8** The site at St John's Studio makes no contribution to the architectural interest of the conservation area. Though its yellow brick is broadly appropriate its construction in stretcher bond is poor quality. The applied details around windows and the heavy timber baroque porch hood are incongruous. The cladding material to the link is low quality and badly painted to replicate brickwork. Its position set back from the road behind the building lines of the adjacent early 19th century properties means that it is recessive within the oblique views along the street, limiting its visual contribution to the area and to a degree neutralising and limiting the extent to which the poor material quality is perceived.

Historic Value

- 4.9** The conservation area derives significance in part from the illustration of 19th century expansion of London's suburbs following improved transportation provision. In the northern part of the conservation area the rise of a middle class is illustrated in the large mansion blocks that provided a comparatively dense domestic level whilst still facilitating a social division between family and staff within the block. The area of the site, sub area 2 of the conservation area particularly exemplifies this illustrative historic value.
- 4.10** There is some historic associative value with the building Samuel Cuming, a property developer responsible for several of the roads in this area including the villas at the northern end of Harley Road (CAA 2009, p.15-16). His involvement was also linked to the creation of the Eton and Middlesex Cricket Ground to the north of Primrose Hill, though subsequently relocated. Cuming was an entrepreneurial individual, originally a carpenter from Devonshire he eventually

died in 1871 hugely wealthy and with a business employing up to 80 men in the mid 19th century and responsible for a large number of buildings in this area⁷.

- 4.11** No associations with key individuals of any historic interest have been identified with St John's Studio, or St John's Lodge.
- 4.12** The building on the site at its original construction almost certainly contributed to the illustration of the social standing of the prominent St John's Lodge, the prominent corner building adjacent to the site. However, this illustrative interest has been entirely eroded by later changes and reconstruction that has removed all historic integrity to this site beyond its footprint. The property has been divided and the building on the site, a poor quality later 20th century building has no sense of the probably diminutive coach house or stable that was originally constructed here.

Artistic and archaeological value

- 4.13** The conservation area has no identified archaeological priority areas and although archaeological potential is outside the remit of this report the conservation area appraisal does not pick up on archaeological interest as a key strand of the area's special interest.
- 4.14** Similarly artistic values are comparatively limited and the aesthetic merits of the area strongly linked to the architectural character of individual and groups of buildings.

Views

- 4.15** The conservation area appraisal picks up on views and vistas that are relevant and important to the experience of the conservation area from within it and from within the surrounding area. Views towards and from local landmarks are highlighted as are broad views over the conservation area from the high ground at Primrose Hill.
- 4.16** Views through the conservation area are typically accentuated by either long linear views along streets with strong building characteristics and building lines such as on King Henry's Road, or more curved and sinuous views much shorter in length,

⁷ T F T Baker, Diane K Bolton and Patricia E C Croot, 'Hampstead: Chalcots', in *A History of the County of Middlesex: Volume 9, Hampstead, Paddington*, ed. C R Elrington (London, 1989), pp. 63-66. *British History Online* <http://www.british-history.ac.uk/vch/middx/vol9/pp63-66> [accessed 29 September 2021].

where buildings appear around corners glimpsed through gates or past planting, and are seen in a more intimate close surroundings.

4.17 The views west along King Henry's Road and the view into the conservation area south east along Harley Road are highlighted as notable. It is important to note that these views pass the application site but do not actually feature the building on the site because of its set back position and scale.



Figure 14 (left): St John's Lodge a prominent corner building at the north eastern corner of the conservation area.

Figure 15 (right): 'notable view' into the conservation area along Harley Road. The site is not visible though the entrance to it is the first gate on the left side of the road.



Figure 16: View west at the western end of the King Henry's Road, past the site which is well screened with mature trees that give a leafy spacious feel to the entrance to the conservation area here.

5. Heritage Impact Assessment

- 5.1** This chapter of the report assesses the impact of the proposed development on the significance of the heritage assets identified in the previous chapter.
- 5.2** St Johns Studio is identified in the Conservation Area Appraisal as a neutral contributor to the character and appearance of the conservation area – pre-application discussions confirmed this and that its replacement was deemed acceptable in principal as it does not make a positive contribution to the conservation area. Close inspection of its details and material qualities show that they are mediocre in their character and offer a poor response to the surrounding buildings which, at this end of Harley and King Henry's Roads are large early Victorian buildings with strong sense of material coherence and scale. In these poor quality details and materials the present building dilutes and confuses the narrative of the actual historic surviving buildings at this end of Harley Road.
- 5.3** The building makes no contribution to the area's historic interest, any such contribution was eroded in the reconstruction of the building in the later 20th century though the footprint of the building conforms to the situation shown on historic maps.

Proposals

- 5.4** The current proposals are to adapt the existing structure providing a new cladding material, steeply sloped elevations and an extended and amended roof form to provide additional accommodation. The interior will be reordered the interior to better suit family living requirements and provide more logical circulation spaces. A full Design and Access statement has been provided and details the changes made since the pre-application engagement and design considerations made over the façade treatment within the wider conservation area context.
- 5.5** The materials will include a terracotta rain screen cladding system. This material can be provided in a variety of colours and shades and several options have been considered (see DAS page 36 and page 39). Initially the material was proposed as matched in colour to the adjacent Victorian villa buildings. This, however, lessened a sense of distinction and the final proposal is to provide a dark green colour

intended to be a recessive tone that, from Harley Road, will blend with mature trees that form the backdrop to the building. It will also sit well back from the historic buildings to either side with their paler yellow London brick standing out further within the street scene. The 'link' structure, which physically connects the subject building to the adjacent St John's Lodge, will be set further back and have a simpler glazed façade emphasising the 'gap' between the two structures. A modern aesthetic is provided that will respect the character of the surrounding buildings without 'copying' them.

5.6 The building will be extended by one additional floor within an adapted and only slightly taller roof form. At ground floor level though the main building extends slightly forward, the link portion is pulled back from its existing footprint to increase a sense of a 'gap' between it and the adjacent property. The new building footprint remains considerably set back from the street frontages on Harley Road. The extended rear building line will maintain the stepped footprint and rear building line already present between no.1 Harley Road and St John's Lodge.

5.7 Internal alterations will relocate the stairs to the link structure, freeing the main part of the building for spacious family rooms with outlooks to the main garden areas.

Impact on architectural value

5.8 The host building at St John's Studios is not of architectural interest and does not make a positive contribution to the conservation area. As such it is inherently an appropriate site for development and such sites are identified as being appropriate locations for redevelopment subject to the proposals presented within local policy.

5.9 The conservation area contains modern buildings (no.26a) that honestly reflect the progression of architectural expression into the current era. These modern buildings are capable of being successful elements of the conservation area.

5.10 The proposals respect the existing footprint of the building on the site and thus maintain the longstanding relationship between built forms at this end of Harley Road. The proposed reworking of this structure will not render it any more prominent in the street scene or in relation to the adjacent buildings. The building is provided with an additional storey but it will remain entirely visually subservient

to the taller traditionally roofed forms at St John's Lodge and the nearby properties on both Harley Road and King Henry's Road. The amended roof form will continue to sit below the eaves line of St John's Lodge and will read as a modern interpretation of a mansard form. Its inherently simpler form, proposed darker facing materials, and retained set back footprint will respect the architectural prominence and primacy of the older buildings on either side.

- 5.11** In providing an overtly modern response to this site the scheme does not dilute the historic architectural interest of the adjacent buildings that so clearly reflect the early 19th century styles. The removal of the poor quality idiosyncratic applied details and poor quality stretcher bond brickwork is an improvement on the material qualities. The chosen modern cladding and materials are entirely sympathetic to the surrounding palette without pretending to be Victorian. The horizontal emphasis of the façade treatment echoes the strong horizontal storey bands on the older properties without pastiche replication. The approach taken is one that preserves the recessive nature of the building on this site, set back from the prevailing building lines and enabling the surrounding buildings to remain entirely at the fore of the conservation area's architectural interest.

Impact on historic value

- 5.12** Historic values of the conservation area will be entirely preserved without change. The documentary record of the development of the area will be unaffected by this change and the ability to understand the development of the area through the varying built forms and styles will remain. In creating a more clearly understandable modern approach to this site the narrative of development in this part of Harley Road will become clearer than the current situation where the poor quality pastiche building currently on the site will become more easily understandable as a modern reconstruction. The historic maps will remain as evidence to the longevity of built form on this particular site.

Impact on views

- 5.13** The views identified as notable within the area will remain unaffected and entirely preserved. The building's position within the site will not change and the recessive nature of built form on this site will be entirely preserved in the longer oblique views along the roads into and out of the conservation area. The new works will not

affect the ability to see or understand the prominent Victorian Buildings of St John's Lodge, or the villas on King Henry's or Harley Roads. Direct views into the site will of course include the re-worked building and its new materials and height but this is not erosive of heritage values, the conservation area's overall character already includes buildings from multiple different periods, including redeveloped sites. This proposal will not increase the prominence of this site or the building thereon.

Overall assessment of effect

5.14 In summary, the proposals will preserve the character and appearance of the conservation area. It will enhance the legibility of the historic development of this area by removing poor quality pastiche and replacing with an honestly modern architectural response that entirely respects and preserves the historic and architectural interest of the adjacent buildings that survive from this area's earliest development. In improving the material quality and architectural expression on this particular plot the architectural interest of the conservation area is enhanced with a carefully designed building of its current era that reflects the ongoing development of appropriate plots within this otherwise historic suburban area.

6. Conclusions

- 6.1** The building on the site is identified within the Elsworthy Road Conservation Area Appraisal as a neutral contributor to the Conservation Area. Close inspection reveals its actual material character to be of poor quality that detract from the material and aesthetic values of the Harley Road street scene.
- 6.2** The proposals seek to adapt this building providing it with modest extensions that will continue and preserve its recessive position and scale in relation to the street's other buildings and offer a distinct material enhancement in terms of the quality of its elevational materials and aesthetic. In providing a clearer and more honest approach to the building in a modern architectural response the prominence and quality of the adjacent historic buildings is emphasised and the architectural values of the area overall improved. The proposals have been adapted to address concerns raised during pre-application discussions with the council.
- 6.3** Local planning policy allows that buildings which do not make a positive contribution to the character of a conservation area can be developed. The proposals presented by Gianni Botsford Architects maintain the existing built footprint but offer a more sensitive approach to the aesthetic of this building in the conservation area. The reuse of much of the existing materials captures the embedded energy in the structure and offers a sustainable approach to redevelopment of this site. The proposals are legibly current in architectural language but inherently sensitive to the heritage character of the surroundings without being derivative or pastiche. In this way the heritage character is emphasised without dilution and actual development of the area remains clear and understandable to all.
- 6.4** The scheme presented complies with local policy D2 parts e, f and h. The existing building is not a positive contributor. The proposed works sustain and enhance the character and appearance of the conservation area, and will preserve the elements of the site that have a garden character contributing to the leafy spacious sense of the domestic suburb particularly in the north western part of the conservation area. No harm is caused within the terms of the NPPF as the architectural and historic values of the conservation area are entirely preserved. As no harm is caused

paragraphs 200-202 of the NPPF are not engaged and there is considered to be preservation for the purposes of section 72 of the Act.

Appendix 1

Scale of Harm (HCUK, 2019)

The table below has been developed by HCUK Group (2019) based on current national policy and guidance. It is intended as simple and effect way to better define harm and the implications of that finding on heritage significance. It reflects the need to be clear about the categories of harm, and the extent of harm within those categories, to designated heritage assets (NPPF, paragraphs 201 and 202, and guidance on NPPG).⁸

Scale of Harm	
Total Loss	Total removal of the significance of the designated heritage asset.
Substantial Harm	Serious harm that would drain away or vitiate the significance of the designated heritage asset
Less than Substantial Harm	High level harm that could be serious, but not so serious as to vitiate or drain away the significance of the designated heritage asset.
	Medium level harm, not necessarily serious to the significance of the designated heritage asset, but enough to be described as significant, noticeable, or material.
	Low level harm that does not seriously affect the significance of the designated heritage asset.

HCUK, 2019

⁸ See NPPG 2019: "Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated." Paragraph 018 Reference ID: 18a-018-20190723.

Standard Sources

<https://maps.nls.uk>

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www.heritagegateway.org.uk

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National Planning Policy Framework, 2021

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